

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THE SATANIC TEMPLE, INC.,

Plaintiffs,

v.

SAUCON VALLEY SCHOOL DISTRICT,

Defendant.

CIVIL ACTION NO. 5:23-cv-01244

AFFIDAVIT OF DAVID BONENBERGER

I, David Bonenberger, hereby declare as follows:

1. I am currently employed by the Saucon Valley School District (“District”) as the Business Manager for the District, a role I have held since 2004.
2. As Business Manager, I am in charge of the financial operations of the District.
3. I am also the District’s Safety Coordinator, and in this role, I am responsible for making sure trainings and safety drills are completed and reviewing the District’s safety operations and emergency response plans.
4. As one of the District’s Central Office Administrators, at times, I will also facilitate the rental of District facilities by outside individuals and organizations.
5. Because of my role as the District’s Safety Coordinator, I am especially attuned to security concerns when reviewing facility use requests by outside individuals and organizations.
6. Even before the District received the shooting threat in February 2023, the Superintendent and I had discussed potential changes to the District’s Facilities Use Policy to address security concerns with outside individuals’ access to our campus.

7. During the fall of the 2022-2023 school year, I became aware that flyers for the Good News Club, as well as some other organizations holding non-school sponsored events and activities on District property, were going home with students. As this was not permitted under District policy governing the distribution of materials by non-school sponsored or affiliated programs, I instructed one of my administrative assistants to inform the building administrators who oversee the District's Elementary School, Middle School, and High School, to cease the distribution of any materials for non-school sponsored events and activities immediately. It is my understanding that this practice stopped.

I declare under penalty of perjury that the above is true and correct.

Date:

4/11/23



David Bonenberger